

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

MARK I. SOKOLOW, *et al.*,

Plaintiffs,

vs.

THE PALESTINE LIBERATION  
ORGANIZATION, *et al.*,

Defendants.

No. 04 Civ. 00397 (GBD) (RLE)

**DECLARATION OF CARMELA T. ROMEO IN SUPPORT OF  
APPLICATION FOR AN ORDER DIRECTING DEFENDANTS  
TO DEPOSIT FUNDS INTO THE REGISTRY OF THE COURT**

**AND IN**

**OPPOSITION TO MOTION TO STAY EXECUTION OF JUDGMENT  
AND TO WAIVE THE BOND REQUIREMENT**

CARMELA T. ROMEO hereby declares:

1. I am a member of the bar of this Court and of the law firm of Arnold & Porter LLP, counsel for the plaintiffs in the above-captioned action. I make this declaration to provide additional documents in support of plaintiffs' application for an order directing defendants to deposit funds into the registry of the Court and in opposition to defendants' motion to stay execution of judgment and to waive the bond requirement.

2. Attached as Exhibit 1 to this declaration is a true and correct copy of the PA's operating budget for the year 2012, published by the PA's Ministry of Finance on its official website, *available at* <http://www.pmof.ps/en/41>.

3. Attached as Exhibit 2 to this declaration is a true and correct copy of Exhibits B & E to the Declaration of Prime Minister Salam Fayyad dated May 2008, submitted by defendants

in *Knox v. PLO*, No. 03 Civ. 4466 (VM)(THK) and as referenced in *Knox v. PLO*, 2009 WL 1591404 (S.D.N.Y. Mar. 26, 2009), *R&R adopted*, 628 F. Supp. 2d 507 (S.D.N.Y. 2009).

4. Attached as Exhibit 3 to this declaration is a true and correct copy of the injunction issued against defendants in *Ungar v. PA*, C.A. No. 00 - 105L, Order dated May 5, 2005.

5. Attached as Exhibit 4 to this declaration is a true and correct copy of the Palestine Investment Fund's Annual Report for the year 2012.

6. Attached as Exhibit 5 to this declaration is a true and correct copy of a letter from Head of the PLO Mission Afif Safieh to Secretary of State Condoleeza Rice, dated April 27, 2006.

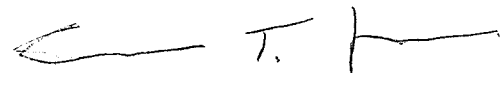
7. Attached as Exhibit 6 to this declaration is a true and correct copy of a letter from Secretary of State Condoleeza Rice to PA President Mahmoud Abbas, dated Jan. 12, 2007.

8. Attached as Exhibit 7 to this declaration is a true and correct copy of a letter from Jeffrey Buckholtz to Judge Victor Marrero, dated February 29, 2008.

9. Attached as Exhibit 8 to this declaration is a true and correct copy of a letter from Minister of Finance Salam Fayyad to Secretary of State Condoleeza Rice, dated June 18, 2005.

10. I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
May 29, 2015

  
Carmela T. Romeo